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August 21, 2013

Brian Jones
Senior Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

ID: C00448696

Reference: Year End Report (11/27/12-12/31/12)

Dear Mr. Jones:

This letter is in response to your request for additional information, dated July 18, 2013.

As was noted on the memo page of the Year End Report, the refund from Red Sea was for independent expenditures made for

Don Stenberg throughout 2012. The Committee cannot amend an earlier report and adjust a previously reported amount, because those were the expenditures made at that time. Media purchases do not always air as intended and it is not unusual to receive a refund at the end of a campaign cycle. The refund is not necessarily tied to any specific original expenditure, but may be the sum of several smaller credits over the cycle. Further, the Committee believes it should not be reported on Schedule A of Line 15 because it is not a refund of an operating expenditure.

In order to accurately report the aggregate total of independent expenditures made during the cycle for Don Stenberg, the credit from Red Sea must be disclosed as a negative independent expenditure on line 24. In the future, the Committee could potentially also list any independent expenditure refunds from vendors on line 17 as a memo entry to further indicate a refund of an expense other than an operating expense.

The Committee believes no amendment is required at this time.

Sincerely,

Lisa Lisker
Treasurer
